REMARKS

In response to the Office Action mailed on December 20, 2006, Applicant(s) respectfully request(s) reconsideration.

Claim(s) 1-32 are now pending in this Application. In this Amendment, claim(s) 1, 8, 15, 22, 29-32 have been amended and claim(s) 3 and 16 have been canceled. Claim(s) 1, 15 and 30-32 are independent claims and the remaining claims are dependent claims.

Applicant(s) believe that the claim(s) as presented are in condition for allowance. A notice to this affect is respectfully requested.

Objections:

Claims 8, 22 and 29 have been objected to for minor informalities. Applicant thanks the Examiner for these observations; the above amendments correct the noted deficiencies.

Rejection under 35 U.S.C. §101:

Claims 30 and 31 have been rejected as being nonstatutory. Accordingly, Claims 30 and 31 have been herein amended to recite a computer readable storage medium having encoded set of processor based instructions defined as program code encoded thereon and executable by a processor responsive to the instructions, to bring the subject matter of the claims within 35 U.S.C. §101. It is therefore respectfully requested that the rejection under 35 U.S.C. §101 be withdrawn.

Rejection under 35 U.S.C. §102(b) based on Chiang, U.S. Pub. No 2001/0037490:

Claim(s) 1, 3-7, 10-11, 13, 30-32 were rejected under 35 U.S.C. §102(b) as being anticipated by Chiang, U.S. Pub. No 2001/0037490 (Chiang '490, et al.). Applicant(s) respectfully disagree(s) with these contentions and assert that

the present claimed invention is not anticipated by any disclosure in the Chiang '490 reference.

The Office Action rejects claims 1,3-7, 10, 11, 13 and 30-32 based on Chiang '490. However, the claimed invention differs from Chiang '490 because Chiang is concerned only with graphical display objects. Specifically, with respect to claim 1, Chiang teaches a system in which graphical display entities developed by graphic designers and business analysts [0026] are integrated with underlying function and business logic developed by programmers [0028]. The Chiang disclosure attempts to bridge the gap between the technical and artistic aspects by using the graphic UI files as input [0038].

In contrast, the claimed invention receives an arbitrary set of base application objects, including and makes a determination of graphical display or processing logic content (15:24-31). Further, the claimed approach determines a set of relationships between the graphical screen elements and the processing objects, as discussed at page 16, lines 4-15. The determined relationships are employed as an ongoing runtime exchange between the client runtime engine and the server runtime engine operating as a reflection of the base application.

The invention of claim 1 is distinguishable from Chiang '490 because Chiang does not show, teach, or disclose remote application objects 50 translated from the base application 26, and employed by the server runtime engine to generate GUI executable objects 52 on the remote client runtime engine via transportable objects 40, 42.

Nonetheless, to further clarify Applicant's claimed invention, Applicant herein amends claim 1 with the subject matter of claim 3 to recite determining if the object is a GUI object or a processing object, and if the object is a GUI object, generating a reference (68) to the server runtime engine, as discussed at page 15, line 28-page 16 line 3. The selective processing as a GUI object or processing object determines if the object communicates with the server runtime engine or remote API client, as discussed at page 14, lines 12-23.

The Office Action further suggests that Chiang '490 teaches the subject matter of claim 3 at paragraph [0057]. In Chiang, however, an attribute is discussed that is extracted from the tags in the input graphical display file (i.e. html source). An attribute then indicates a rule for generating corresponding code. Such an attribute is merely parsed from the input file itself; no association to another object is disclosed. Accordingly, such a tag/attribute parsing cannot be said to define an association to another object such as the claimed associations between data store objects (50B) and display objects (50A).

The remote API client is therefore concerned with associations to the data sources at the base application, while the server runtime engine is concerned with associations to GUI display objects (50A) in the web client. Chiang '490 is void of any disclosure on such associations.

The reference identified in claim 3 (now recited in claim 1) is stored as an association between the relevant objects. Claim 30, rejected on similar grounds as claim 1, has been herein amended with subject matter from claims 4 and 5 to clarify the distinguishing feature of associations in the association table 68. Accordingly, claim 30 now recites identifying associations between the remote application objects and the GUI display elements, and storing, in an associated object table, the identified associations, as discussed at page 16, lines 9-16.

The office action suggests that Chiang teaches the features of claim 5 at paragraphs [0061] and [0053]. As discussed above, however, the parsed attribute/value in Chiang '490 is from the same input file, or object, and therefore does not define a reference or association to another object as the claimed association fulfills. Further, the storing of the input files cannot be said to anticipate the association table 68 because no association to another object has been defined. An attribute value has merely been parsed from the same object/file. Accordingly, claim 30 is submitted as allowable because Chiang makes no showing, teaching, or disclosure of identifying associations between the remote application objects and the GUI display elements, and storing, the

identified associations in an associated object table, as now recited in amended claim 30.

Still further, claim 31, rejected on similar grounds as claim 1, has been herein amended with the subject matter of claims 7 and 8, to further clarify and distinguish over Chiang '490. Claims 7 recites references to external data sources serving the base application, and claim 8 clarifies this feature as a SAN (storage area network) manageable entities, such as a disk storage array. Accordingly, claim 31 is submitted as allowable because Chiang makes no showing, teaching, or disclosure of external data sources, and further no disclosure of the significant feature of manageable entities in a SAN.

The Office Action suggests the Chiang '490 teaches such external data source references, however the Chiang approach teaches input file attribute values employed during code generation. Accordingly, such attribute values are compile entities, static at runtime, and do not anticipate the claimed references between manageable entities and data sources because such references provide dynamic, runtime storage and retrieval about manageable entities in the SAN, as recited in amended claim 31.

In further clarification of salient features of Applicant's claimed invention, claim 32, rejected on grounds similar to claim 1, has been herein amended with subject matter of claims 3, 5, 7 and 8, as discussed above, to further clarify and distinguish, and are therefore believed allowable for the reasons set forth above.

Rejection under 35 U.S.C. §103(a) based on Chiang, U.S. Pub. No 2001/0037490 in view of Frey, U.S. Patent No. 6,530,036:

Claims 2 and 16 have been rejected under 35 U.S.C. §103 (a) as being anticipated by Chiang, U.S. Pub. No 2001/0037490 (Chiang '490, et al.) in view of Frey, U.S. Patent No. 6,530,036 (Frey '036). With respect to claim 15, claim 15 does not appear to be specifically rejected in the Office Action. However, Applicant's construes the rejection of claim 16 necessarily encompasses claim 15.

Specifically, with respect to claim 16, because the label mapper is applicable to the location of an entire object, not individual memory references within an object or executable image as in Frey (col. 3, line 67- col. 4, line 16). Thus, Frey '036 is concerned with identifying a particular memory reference by a particular instruction, while the claimed object mapping identifies the claimed corresponding remote application object, thus operative on an entirely different granularity than the Frey system. Since the Frey system addresses individual memory references, the references in Frey do not point to executable objects or images, and thus do not show, teach, or disclose the claimed generated remote application object operable for execution in the remote deployment. Mere memory references computed in the Frey system do not denote executable objects suitable for transfer of control.

Inasmuch as claim 15 could be said to correspond to independent claims 1 and 30-32, claim 15 is submitted as allowable based on the discussion above with respect to claim 1. However, to further clarify and distinguish significant features of Applicant's invention, Applicant has herein amended claim 15 with the subject matter of claim 16, and further with subject matter of claim 17 to clarify that the granularity of object selection allows determining, if the object is a GUI object or a processing object.

As the remaining claims depend, either directly or indirectly, from claims 1, 15 and 30-32, it is respectfully submitted that all claims in the case are now in condition for allowance.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-3735.

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 616-9660, in Westborough, Massachusetts.

Respectfully submitted,

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